

The Sherwin-Williams Company 101 Prospect Avenue, N.W. Cleveland, Ohio 44115-1075

October 19, 1995

Via Federal Express

and Fax (212) 637-3199
Carl Howard, Esq.
New Jersey Superfund Branch
Office of Regional Counsel
U.S. Environmental Protection Agency
Region II
290 Broadway
New York, NY 10076-1866

Re:

Route 561 Dump Site, Gibbsboro, New Jersey

Request for Information

Dear Carl:

This letter is in response to U.S. Environmental Protection Agency's Request for Information for the above-referenced site. Sherwin-Williams has conducted an extensive review in response to this request. Without waiving any objections, Sherwin-Williams answers the Request for Information as follows:

- The Sherwin-Williams Company
 101 Prospect Avenue, N.W.
 Cleveland, OH 44115
- John G. Breen
 Chairman and Chief Executive Officer
 The Sherwin-Williams Company
 101 Prospect Avenue, N.W.
 Cleveland, OH 44115

Thomas A. Commes
President and Chief Operating Officer
The Sherwin-Williams Company
101 Prospect Avenue, N.W.
Cleveland, OH 44115

1c. The Sherwin-Williams Company is a corporation incorporated in the State of Ohio in 1884. Sherwin-Williams' agent for service of process in Ohio is CT Corporation, 815 Superior Avenue, N.E., Cleveland, Ohio 44115. Sherwin-Williams' agent for service of process in New Jersey is the CT Corporation Trust Company, 28 West State Street, Trenton, NJ 08608.



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- 1d. Not applicable.
- See enclosed list of officers and directors from 1994 Annual Report. Please advise if additional information is requested.
- 3. Sherwin-Williams has not identified detailed information on manufacturing processes at the Gibbsboro plant through the time period that John Lucas and Company sold the property defined as "the Site" in 1946. From 1967, The Sherwin-Williams' Gibbsboro plant manufactured interior and exterior house paint, latex, oil-based interior and exterior house paint until 1975, lacquer finishes until 1975, polymerized oils and formulated dyes until 1972. Prior to 1967, John Lucas and Company operated the plant.

With respect to the formulation and manufacture of house paint, polymer is placed in a tank. Pigments are dispersed through the polymer. The material is stabilized by the addition of a resin or solvent. The material is pumped to a thin-down tank. Resins, dryers and additional solvents and colorants are then added to make the final product.

For the production of latex paint, water and surfactant are placed in the tank. Pigments are then dispersed into the water and surfactant. The material may then be stabilized by adding water or ethylene glycol. The material is then pumped to a thin-down tank. Latex dryers, additives and colorants may be added to make the final product.

In the production of lacquer finishes, nitrocellulose is mixed with a weak solvent in a tank. Pigment is then added. Strong solvent is then added. The mixture is dispersed. The material is then pumped to a thin-down tank where solvents, plasticizer and colorants are added.

In the production of alkyd resins, oil and glycerin are placed in a kettle and the mixture is heated. Phthalate anhydride is then added to the mixture. Polyols or glycerin may then be added (depending on the type of resin used). The mixture is heated and placed in tanks where mineral spirits are added.

In the production of Sher-dye, a cloth dye, pigment is mixed in the dye works.

Sherwin-Williams has not identified any information on changes to any manufacturing or process lines in the 1930's.



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Maps and documents such as depositions of ex-employees, are available for inspection and copying at the offices of Crummy, Del Deo, Dolan, Griffinger & Vecchione in Newark, New Jersey.

4. Sherwin-Williams believes that the following raw materials were used at the Gibbsboro facility from approximately the late 1950's. Titanium Dioxide was a major component for products manufactured at the Gibbsboro plant. Polymers, pigments, Linseed Oil, Soya Oil, Ray Linseed Oil, Mineral Spirits, Refined Linseed Oil, Glycerine, V.M.&P. Naptha and xylene were utilized in resin production. In lacquer production, the raw materials used included isobutyl alcohol, c.p. acetone, methyl amyl acetate, isopropyl acetate, xylene, lacquer solvent, toluene, toluene based solvent blend, methyl ethyl ketone, ethyl acetate, isopropanol, methyl butyl ketone and aromatic naptha. In production of Sher-dye, pulp pigments, liquid mixers and solvents were used.

Documents which may refer to raw materials are available for inspection at the law firm of Crummy, Del Deo in Newark, N.J. Sherwin-Williams has not identified specific information or records regarding raw materials used during John Lucas and Company's ownership of the property known as the Site.

- 5. See response to question 3. The Sherwin-Williams Gibbsboro plant manufactured interior and exterior house paint, (oil-based) until 1975. Lacquer finishes were manufactured until 1975. The plant manufactured latex paint until 1977. Polymerized oils and formulated dyes ceased production in 1972. Sher-dye, a cloth dye, was also manufactured at Gibbsboro until 1977. Documents which may refer to such products are available at Crummy, Del Deo.
- 6. Dyes were manufactured at Gibbsboro until approximately 1977 (see response to question 5).
- 7. Sherwin-Williams has not identified any information that the particular pigments were formulated or manufactured at the Gibbsboro plant. Pigments were used in the production of paint products, including Prussian, Chinese and Milori Blue, chrome green and chrome yellow during some period of time until the 1960's. Pursuant to company operating procedures, every effort was made to rework off-spec type product or sell it.

Sherwin-Williams has conducted a detailed search of documents relating to hauler information and has not identified any information on disposal at the Route 561 Dump Site (block 18.07, lot 9). Sherwin-Williams has not located any information on any disposal activities



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on this property during Lucas' ownership. Sherwin-Williams used various haulers and off-site locations for wastes from manufacturing operations. Sherwin-Williams believes that paint sludge was placed on the area of the Gibbsboro paint plant (not on the Site) in Gibbsboro during the 1960's and 1970's.

- 8. Sherwin-Williams visited the site in 1994 in response to a claim by New Jersey Department of Environmental Protection. The site was visited by Gordon Kuntz of Sherwin-Williams and Sally Jones of Roy F. Weston, Inc. Sherwin-Williams' consultant. The site was an open field covered with heavy vegetation. Two five-gallon pails were observed (contents, if any, unknown).
- 9. Sherwin-Williams did not conduct an environmental assessment or inspection other than as discussed in response to question No. 8 above.
- 10. Sherwin-Williams has searched real estate and title documents and has not determined who John Lucas and Company purchased the site from. (block 18.07, lot 9 was sold by John Lucas & Company in 1946).
- 11. Sherwin-Williams has not located any document regarding the purchase or purchase date of the property by John Lucas and Company.
 - 12. See responses to questions 10 and 11.
- 13. See enclosed documents which show sale of block 18.07, lot 9 by John Lucas and Company in 1946.
- 14. See response to question 13 above. Sherwin-Williams has not identified any documentation of payment of property taxes by John Lucas and Company for the Site property. lot 9.
- 15. Sherwin-Williams has not identified any documentation of payment of other taxes with respect to the property covered by the site.
- Sherwin-Williams has not identified any leases entered into by John Lucas and Company relating to the property covered by the Site.
- 17. Sherwin-Williams has not identified any information on notification by John Lucas and Company to federal, state or county or town regulator that it sold the property covered by the site, other than the deed referenced in the enclosed title records.



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- 18. Sherwin-Williams has not identified any information on any broker involved in the sale of the property by John Lucas and Company.
- 19. Sherwin-Williams has not identified any information on any individuals' involved in the sale on behalf of John Lucas and Company. Sherwin-Williams believes that the property was sold by John Lucas and Company to Charles Hollinger (deceased).
- 20. According to Cooper Abstract Company's review of record indices in the Register of Deeds Office in Camden County, (enclosed) the following entities held deeds to Block 18.07 Lot 9 for the following time periods beginning in 1935: See enclosed title records.
 - John Lucas & Company, Inc.
 a Delaware Corporation
 1935
 - John Lucas & Company, Inc.
 a Maryland Corporation
 August 31, 1935 April 5, 1946
 - Charles S. Hollinger and Mary L. Hollinger April 5, 1946 - April 15, 1946
 - d. Louis G. Wacker and Mary Wacker April 15, 1946 - April 17, 1978
 - e. Nicholas DiVentura and Theresa M. DiVentura April 7, 1978 - March 23, 1979
 - f. John diMaria and Mario diMaria March 23, 1979 - April 28, 1980
 - g. Salvatore Mario diMaria
 April 28, 1980 to present

In addition, Joseph Parisi is identified as an Owner/Operator in the New Jersey DEP's Investigation Report for the Site.



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According to Cooper Abstract Company's review, the following entities owned block 14.02, lot 1:

- John Lucas and Company, Inc.
 a Maryland Corporation
 April 15, 1946
- Charles S. Hollinger and Mary L. Hollinger April 15, 1946 - June 18, 1947
- Nicholas DiVentura and Theresa M. DiVentura
 June 18, 1947 April 11, 1978
- Nicholas DiVentura
 April 11, 1978 May 2, 1980
- e. John DiMaria and Salvatore Mario DiMaria May 2, 1980 - September 9, 1985
- f. Morris Novack September 9, 1985 - January 20, 1988
- g. Thomas J. Scott, Trustee of the Parisi Real Estate Trust January 20, 1988
- Joseph Parisi, Joseph M. Parisi and Annette Parisi January 20, 1988 - Present
- 21. Sherwin-Williams has not identified any Sherwin-Williams' personnel who was aware between the date of purchase and the date of sale of the Site that hazardous chemicals were present at the Site. Sherwin-Williams notes that Charles Hollinger, the person who purchased the property from John Lucas and Company, is deceased.
- 22. Sherwin-Williams has not identified any information that John Lucas and Company released any hazardous substances at the site during its ownership of the site prior to 1946 or subsequent to this time by Lucas or Sherwin-Williams. Sherwin-Williams understands that sampling results were obtained by the New Jersey Department of Environmental Protection and contained in DEP's <u>Site Investigation Sherwin-Williams' Dump Site</u>, <u>Gibbsboro</u>, <u>New Jersey</u>.



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- 23. Sherwin-Williams understands that "the property" refers to the area defined as "the Site". Sherwin-Williams has not identified any information that a petroleum sheen or other indications of chemical releases were observed during John Lucas and Company's ownership of the site.
- 24a. Sherwin-Williams has conducted an extensive review and has not located any documents identifying the referenced hazardous substances during the site's ownership by John Lucas and Company. See response to Question No. 4 above for information on use of various raw materials at the Gibbsboro plant from the late 1950's.
- b. No documentation has been identified on the amounts of particular hazardous wastes generated by the Gibbsboro Plant during or after John Lucas and Company's ownership of the site.
- c. According to a former Plant Engineer, the great majority of material hauled by Sherwin-Williams's own truck was general non-hazardous plant trash consisting of damaged pallets and bags which had not been compacted. Upon information and belief, this plant trash did not go to the Site. This practice took place from sometime in the 1960's to early 1970's. The former plant engineer believes no more than five drums per week, other than plant trash, were hauled by the Sherwin-Williams truck to another dump site (not the site) in the 1970's. Sherwin-Williams's truck hauled varnish filtering material and sediment from steel cleanup and processing equipment which was collected in steel drums. The former plant engineer recalls this amount was approximately one drum per week.

Paint filtering material was placed into drums. Approximately 70-75% of the filtering and straining media, including filter press papers and filter cartridges, has been used to strain the latex paint products. This paint filtering material and residue produced approximately three drums per week. Sediments and dust collected from bags and floors were from titanium dioxide, a major pigment component for Sherwin-Williams' products. These sweepings and sediments constituted approximately one drum per week. Liquid wastes, including sludges from its latex paint process, were treated and disposed at Sherwin-Williams's plant site, with its septic waste in lagoons. In addition, Sherwin-Williams believed that it made use of a landfill in Gibbsboro across the street from its facility for some period of time until approximately 1972. Solvents were used as fuel and/or reclaimed.



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- d. Sherwin-Williams has not identified any information or records showing that any hazardous substances or other waste materials from the Gibbsboro plant were disposed at the Site. Based on Sherwin-Williams' review, none of the materials described in paragraph 23(c) were disposed at the Site. Sherwin-Williams has not identified any person with personal knowledge of disposal by John Lucas and Company or Sherwin-Williams at the Site.
 - 25. See response to Question No. 24.
- 26. During the 1970's, Sherwin-Williams utilized Modern Way, Continental Vanguard, ABM Disposal, Marvin Jonas, Inc. and Max Ellis as well as its own truck to transport and dispose of various solid and liquid waste. Sherwin-Williams also made use of its own dump site across United States Avenue from its facility. Sherwin-Williams has reviewed information relating to these entities and available information on disposal locations. Sherwin-Williams has not identified records which show total quantities of hazardous substances that went to various sites. There is no information that these entities took waste material to the Site. See also response to Question 24.
- 27. See responses to questions 24 and 26 above. In the 1970's, Sherwin-Williams had arrangements with contractors to haul waste materials from the Gibbsboro plant. Sherwin-Williams has not identified any information indicating that any of these haulers took waste material to the site. Sherwin-Williams has not identified any information regarding any arrangements made during the time that John Lucas and Company owned the site.
- 28. Sherwin-Williams has not identified any individuals who may have personal knowledge of the disposal of any waste material by John Lucas and Company or Sherwin-Williams at the site. Sherwin-Williams has not identified any companies whose material may have been treated or disposed at the Site.

The following individuals have knowledge regarding waste materials generated at the former Sherwin-Williams Gibbsboro plant:

- Robert DuLaney
 807 Chestnut Avenue
 Woodbury Heights, NJ 08096
- Albert Gosa
 8555 Tanglewood Trail
 Chagrin Falls, OH 44023



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- Robert Burke
 5729 Laurentide Road
 Burlington, WI 53105
- William Taylor
 16 Cornell Avenue
 Stratford, NJ 08084
- Jack Whiteside
 4544 Berlin Road
 Clementon, NJ 08021
- Al Dutill
 92 Spruce Lane
 Pine Hill, NJ
- James Gadwood
 4401 West North Avenue
 Chicago, IL 60639
- Robert Lambert
 501 Roun Avenue
 Williamstown, NJ 08094
- a. Sherwin-Williams has not identified any contracts or arrangements with any parties referenced in response to questions 26 or 27 who took waste materials to the Site.
- 29b. See enclosed list of insurance policies. Please advise if further information is requested.
- 29c. Sherwin-Williams has not identified any records regarding releases of hazardous substances, hazardous wastes, process residuals or industrial wastes at the Site.
 - 29d. The Sherwin-Williams Gibbsboro plant did not have an SPDES permit.
- 29e. Sherwin-Williams has not conducted any analyses or characterization. See New Jersey DEP Dump Site Investigation Report regarding State analyses.



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- 29f. Sherwin-Williams has not identified any documents indicating disposal of waste materials at the site by John Lucas and Company or Sherwin-Williams.
- 30. Sherwin-Williams has identified the following plant managers and plant engineers who managed day to day operations at the former Gibbsboro plant.
 - Robert Burke
 5729 Laurentide Road
 Burlington, WI 53105
 - Robert DuLaney
 807 Chestnut Avenue
 Woodbury Heights, NJ 08096
 - L.C. Kautz
 625 Sunset Court
 Covington, KY 41011
 - James Gadwood
 4401 West North Avenue
 Chicago, IL 60639
 - Robert Lambert
 501 Roun Avenue
 Williamstown, NJ 08094
- 31. Sherwin-Williams has not identified information on a real estate appraisal done for block 18.07, lot 9.
- 32. Sherwin-Williams has not identified any change in zoning or information regarding a variance obtained with respect to the property covered by the Site.
- 33. Sherwin-Williams has not identified any information regarding soil moving activities or filling at the site by the Company.



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- 34. New Jersey DEP conducted an investigation, including sampling at the area. The DEP report was sent to Sherwin-Williams pursuant to a request by Sherwin-Williams in 1995.
- 35. See DEP report referenced in response to question 34 above. Sherwin-Williams assumes EPA has the report and will provide a copy on request.
- 36. Sherwin-Williams is not aware of any hazardous substances which were generated or removed from the site by the Company.
- 37. Sherwin-Williams is not aware of any inspection other than the site investigation conducted by DEP which is referenced in response to question 34.
 - 38. See enclosed map.
- 39. Sherwin-Williams has not incurred investigation costs relating to the site other than during site visit activities described above.
- 40. According to Cooper Abstract Company's review of record indices in the Register of Deeds Office in Camden County, (enclosed) the following entities held deeds to Block 18.07 Lot 9 for the following time periods:
 - John Lucas & Company, Inc.
 a Delaware Corporation 1935
 - John Lucas & Company, Inc.
 a Maryland Corporation
 August 31, 1935 April 5, 1946
 - Charles S. Hollinger and Mary L. Hollinger
 April 5, 1946 April 15, 1946
 - d. Louis G. Wacker and Mary Wacker April 15, 1946 - April 17, 1978
 - Nicholas DiVentura and Theresa M. DiVentura April 7, 1978 - March 23, 1979



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- f. John diMaria and Mario diMaria March 23, 1979 - April 28, 1980
- g. Salvatore Mario diMaria April 28, 1980 to present

In addition, Joseph Parisi is identified as having an easement to a portion of the Site with Marie DiMaria in the New Jersey DEP's Dump Site Investigation Report. Sherwin-Williams has not identified any persons with knowledge of release of waste materials by Lucas or Sherwin-Williams at the site.

New Jersey DEP's Site Investigation reports details enforcement actions (Narrative, p. 4-5): In 1987, DEP issued a Notice of Violation to Morris Novak for operating a septic system without an NJDEP permit. DEP also determined that a dry cleaning operation had discharged process effluent to the septic system. On September 29, 1993, New Jersey DEP issued a Notice of Civil Administrative Penalty Assessment to Mr. Parisi and Mr. DiMaria for discharges of sewage to the marshy area of the site.

41. The person answering this request is:

Allen J. Danzig Senior Corporate Counsel - Environmental The Sherwin-Williams Company 101 Prospect Avenue, N.W. Cleveland, OH 44115

The response was prepared with assistance from Sherwin-Williams' personnel, personnel of Roy F. Weston, Inc. and attorneys from the law firm of Crummy, Del Deo in Newark, New Jersey. The following persons were consulted in preparing this Request for Information:

- Gordon Kuntz
 The Sherwin-Williams Company 101 Prospect Avenue, N.W.
 Cleveland, OH 44115
- Sally Jones
 Roy F. Weston, Inc.
 Raritan Plaza, I 4th Floor
 Edison, NJ 08837



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- Robert Burke
 5729 Laurentide Road
 Burlington, WI 53105
- Robert Lambert
 Foun Avenue
 Williamstown, NJ 08094
- Robert DuLaney
 807 Chestnut Avenue
 Woodbury Heights, NJ 08096
- 6. Jerry Flamingo
 P.O. Box 731
 Lakeland Pines
 Moneta, VA 24121

Sherwin-Williams reserves its right to supplement these responses.

Very truly yours,

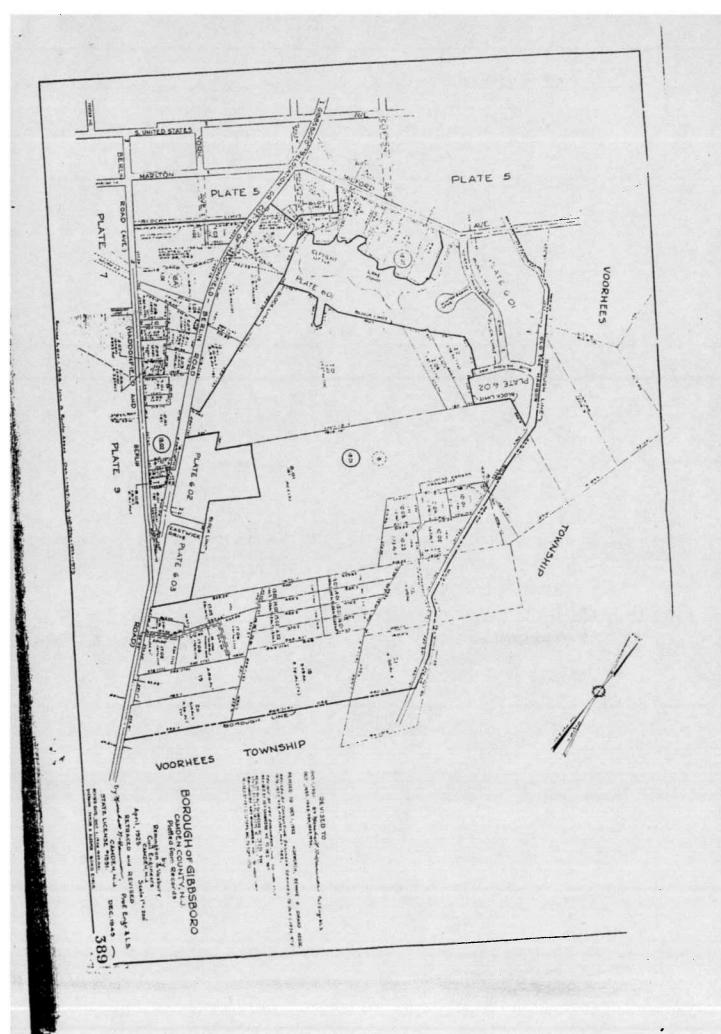
Allen J. Danzig

Senior Corporate Counsel

-- Environmental

AJD:mls

Enclosure



BOARD OF DIRECTORS

James M. Biggar, 66

Chairman and Chief Executive Officer Glencairn Corporation

John G. Breen, 60

Chairman and Chief Executive Officer The Sherwin-Williams Company

Leigh Carter, 69°

Retired, former President and Chief Operating Officer B.F. Goodrich Company

Thomas A. Commes, 52

President and Chief Operating Officer The Sherwin-Williams Company

Daniel E. Evans, 58°

Chairman, Chief Executive Officer and Secretary Bob Evans Farms, Inc.

Robert W. Mahoney, 58

Chairman, Chief Executive Officer and President Diebold, Incorporated

William G. Mitchell, 64°

Retired, former Vice Chairman Centel Corporation

A. Malachi Mixon, III, 54

Chairman, President and Chief Executive Officer Invacare Corporation

Helen O. Petrauskas, 50°

Vice President, Environmental and Safety Engineering Ford Motor Company

Ralph E. Schey, 70

Chairman and Chief Executive Officer The Scott & Fetzer Company

Richard K. Smucker, 46*

President

The J. M. Smucker Company

* Audit Committee Member

CORPORATE OFFICERS

John G. Breen, 60**

Chairman and Chief Executive Officer

Thomas A. Commes, 52**

President and Chief Operating Officer

Larry J. Pitorak, 48**

Senior Vice President-Finance. Treasurer and Chief Financial Officer

John L. Ault, 49**

Vice President-

Corporate Controller

Conway G. Ivy, 53**

Vice President-Corporate Planning and Development

Robert E. Kinney, 59

Vice President-Administration

Thomas Kroeger, 46**

Vice President-Human Resources

Louis E. Stellato, 44**

Vice President, General Counsel and Secretary

James J. Sgambellone, 37

Assistant Secretary and Corporate Director of Taxes

OPERATING MANAGERS

Frank E. Butler, 59**

President & General Manager, Coatings Division

Christopher M. Connor, 38**

President & General Manager, Specialty Division

Thomas M. Coy, 36

President & General Manager, Transportation Services Division

T. Scott King, 42**

President & General Manager, Consumer Brands Division

Blair P. LaCour, 48

President & General Manager, Mid Western Division. Paint Stores Group

John C. Macatee, 43**

President.

Paint Stores Group

Steven J. Oberfeld, 42

President & General Manager, South Western Division, Paint Stores Group

James E. Renshaw, 47

President & General Manager, Eastern Division. Paint Stores Group

Salvatore V. Sanzone, 59

President & General Manager, Southeastern Division, Paint Stores Group

Joseph M. Scaminace, 41**

President & General Manager, Automotive Division

OL EFFECT DATE	POL EXPIR DATE	INSURER	POLICY NUMB
9/1/46		LLOYDS	44U28521
9/1/46	9/1/47	LLOYDS	44U28522
9/1/46	9/1/47	LLOYDS	44U28972
9/1/46	9/1/47	LLOYDS	44U28973
9/1/47	9/1/48	LLOYDS	44U28921
9/1/47	9/1/48	LLOYDS	44U28522
9/1/47	9/1/48	LLOYDS	44U28972
9/1/47	9/1/48	LLOYDS	44U28973
9/1/48	9/1/49	LLOYDS	U36599
9/1/48	9/1/49	LLOYDS & BRITISH	U36600
9/1/48	9/1/49	LLOYDS	U36596
9/1/48	9/1/49	LLOYDS	U36594
9/1/49	9/1/50	LLOYDS	U36596
9/1/49	9/1/50	LLOYDS	U36599
9/1/49	9/1/50	LLOYDS & BRITISH	U36600
9/1/49	9/1/50	LLOYDS	U36594
9/1/50	9/1/51	LLOYDS	U36594
9/1/50	9/1/51	LLOYDS	U36596
9/1/50	9/1/51	LLOYDS	U36599
9/1/50	9/1/51	LLOYDS & BRITISH	U36600
9/1/51	9/1/52	LLOYDS	U36599
9/1/51	9/1/52	LLOYDS & BRITISH	U36600
9/1/51	9/1/52	LLOYDS	U36594
9/1/51		LLOYDS	U36596
9/1/52		LLOYDS	U36594
9/1/52		LLOYDS	U36596
9/1/52		LLOYDS & BRITISH	U36599
9/1/52		LLOYDS & BRITISH	U36600
9/1/53		LLOYDS	U36594
9/1/53		LLOYDS	U36596
9/1/53		LLOYDS & BRITISH	U36599
9/1/53		LLOYDS & BRITISH	U36600
9/1/54		LLOYDS	U36596
9/1/54		LLOYDS & BRITISH	U36599
9/1/54		LLOYDS	U36594
9/1/54		LLOYDS & BRITISH	U36600
9/1/55	TO TOTAL	LLOYDS	U36594
9/1/55		LLOYDS	U36596
9/1/55		LLOYDS & BRITISH	
9/1/55			U36599
		LLOYDS & BRITISH	U36600
9/1/55		LLOYDS & BRITISH	U47890
9/28/55		LLOYDS & BRITISH	U47933
10/5/55		CONTINENTAL CAS	BD9900495
9/1/56		LLOYDS & BRITISH	U36600
9/1/56		CONTINENTAL CAS	RD9906189
9/1/56		LLOYDS & BRITISH	U47933
9/1/56		LLOYDS & BRITISH	U47890
9/1/56		LLOYDS & BRITISH	U36599
9/1/56		LLOYDS	U36594
9/1/56		LLOYDS	U36596
9/1/57	9/1/58	CONTINENTAL CAS	RD9906817
9/1/57	9/1/58	LLOYDS	U36594
9/1/57	9/1/58	LLOYDS	U36596

OL EFFECT DATE	POL EXPIR DATE	INSURER	POLICY NUMBE
9/1/57		LLOYDS & BRITISH	U36599
9/1/57		LLOYDS & BRITISH	U36600
9/1/57		LLOYDS & BRITISH	U47890
9/1/57		LLOYDS & BRITISH	U47933
9/1/58	9/1/59	CONTINENTAL CAS	RDX9984522
9/1/58		LLOYDS & BRITISH	U47933
9/1/58	9/1/59	LLOYDS & BRITISH	U47890
9/1/58	9/1/59	LLOYDS & BRITISH	U36600
9/1/58	9/1/59	LLOYDS & BRITISH	U36599
9/1/58	9/1/59	LLOYDS	U36594
9/1/58	9/1/59	LLOYDS	U36596
9/1/59	9/1/60	LLOYDS	U36596
9/1/59	9/1/60	LLOYDS & BRITISH	U47933
9/1/59	9/1/60	LLOYDS & BRITISH	U47890
9/1/59	9/1/60	CONTINENTAL CAS	RDX9987512
9/1/59	9/1/60	LLOYDS	U36594
9/1/59	9/1/60	LLOYDS & BRITISH	U36600
9/1/59	9/1/60	LLOYDS & BRITISH	U36599
9/1/60	9/1/61	LLOYDS & BRITISH	U47933
9/1/60	9/1/61	CONTINENTAL CAS	RDX9987512
9/1/60	9/1/61	LLOYDS & BRITISH	U47890
9/1/60	9/1/61	LLOYDS & BRITISH	U36600
9/1/60	9/1/61	LLOYDS & BRITISH	U36599
9/1/60	9/1/61	LLOYDS	U36596
9/1/60	9/1/61	LLOYDS	U36594
9/1/61	12/1/61	LLOYDS	U36594
9/1/61	12/1/61	LLOYDS & BRITISH	U47933
9/1/61	12/1/61	LLOYDS & BRITISH	U47890
9/1/61	12/1/61	LLOYDS & BRITISH	U36600
9/1/61	12/1/61	LLOYDS & BRITISH	U36599
9/1/61	12/1/61	LLOYDS	U36596
9/1/61	12/1/61	CONTINENTAL CAS	RDX9517628
12/1/61	12/1/62	LLOYDS & BRITISH	U56189
12/1/61	12/1/62	LLOYDS & BRITISH	U56190
12/1/61	12/1/62	CONTINENTAL CAS	RDX9517715
12/1/61	12/1/62	LLOYDS & BRITISH	U56188
12/1/61	12/1/62	LLOYDS & BRITISH	U56187
12/1/61	12/1/62		U56186
12/1/61	12/1/62		U56185
12/1/62	12/1/63		U56186
12/1/62		CONTINENTAL CAS	RDX9657549
12/1/62		LLOYDS & BRITISH	U56190
12/1/62	12/1/63	LLOYDS & BRITISH	U56189
12/1/62		LLOYDS & BRITISH	U56187
12/1/62	12/1/63	LLOYDS	U56185
12/1/62		LLOYDS & BRITISH	U56188
12/1/63		LLOYDS & BRITISH	U56188
12/1/63	1.000	LOYDS & BRITISH	U56190
12/1/63		CONTINENTAL CAS	RDX9688938
12/1/63		LOYDS & BRITISH	U56189
12/1/63	12/1/64	Marie Control of the	U56186
12/1/63	12/1/64		U56185
12/1/63		LOYDS & BRITISH	U56187

OL EFFECT DATE	POL EXPIR DATE	INSURER	POLICY NUMB
12/1/64	12/1/65	LLOYDS	U63830
12/1/64	12/1/65	LLOYDS & BRITISH	U63831
12/1/64	12/1/65	LLOYDS & BRITISH	U63832
12/1/64	12/1/65	CONTINENTAL CAS	RDX9688907
10/1/65	12/1/65	LLOYDS & BRITISH	U66990
12/1/65		LLOYDS & BRITISH	U63831
12/1/65	12/1/66	LLOYDS & BRITISH	U66990
12/1/65	12/1/66	LLOYDS & BRITISH	U63832
12/1/65	12/1/66	LLOYDS	U63830
12/1/65	12/1/66	CONTINENTAL CAS	RDX9688907
12/1/66	12/1/67	LLOYDS	U63830
12/1/66	12/1/67	LLOYDS & BRITISH	U63831
12/1/66	12/1/67	LLOYDS & BRITISH	U63832
12/1/66	12/1/67	CONTINENTAL CAS	RDX9688907
12/1/66	12/1/67	LLOYDS & BRITISH	U66990
12/1/67	12/1/68	LLOYDS & BRITISH	U63831
12/1/67	12/1/68	LLOYDS & BRITISH	U63832
12/1/67	12/1/68	CONTINENTAL CAS	RDX019151011
12/1/67	12/1/68	LLOYDS & BRITISH	U66990
12/1/67	12/1/68	LLOYDS	U63830
12/1/68		LLOYDS & BRITISH	U66990
12/1/68		LLOYDS	U63830
12/1/68		LLOYDS & BRITISH	U63831
12/1/68		LLOYDS & BRITISH	U63832
12/1/68		CONTINENTAL CAS	RDX019151011
12/1/69	12/1/70		U63830
12/1/69		LLOYDS & BRITISH	U66990
12/1/69		CONTINENTAL CAS	RDX019151011
12/1/69		LLOYDS & BRITISH	100000000000000000000000000000000000000
			U63831
12/1/69		LLOYDS & BRITISH	U63832
12/1/70		LLOYDS & BRITISH	U63830
		LLOYDS & BRITISH	U63831
12/1/70		CONTINENTAL INS	LX1218464
12/1/70		FIRST STATE	920168
12/1/70		LLOYDS & BRITISH	FUL078256
12/1/70		LLOYDS & BRITISH	U66990
12/31/70		LLOYDS & BRITISH	FUL078254
12/31/70		LLOYDS & BRITISH	FUL078257
12/31/70	12/1/71	LLOYDS & BRITISH	FUL078255
12/1/71		CONTINENTAL INS	LX1218464
12/1/71	12/1/72	LLOYDS & BRITISH	FUL078255
12/1/71	12/1/72	LLOYDS & BRITISH	FUL078254
12/1/71	12/1/72	FIRST STATE	920246
12/1/71	12/1/72	LLOYDS & BRITISH	FUL078257
12/1/71	12/1/72	FIRST STATE	920168
12/1/71	12/1/72	LLOYDS & BRITISH	FUL078256
12/1/72	12/1/73	LLOYDS & BRITISH	FUL078255
12/1/72	12/1/73	LLOYDS & BRITISH	FUL078254
12/1/72	12/1/73	CONTINENTAL INS	LX1218464
12/1/72	12/1/73	LLOYDS & BRITISH	FUL078256
12/1/72	12/1/73	FIRST STATE	920168
12/1/72		LLOYDS & BRITISH	FUL078257
12/1/73		CONTINENTAL INS	11LX1218950

OL EFFECT DATE	POL EXPIR DATE	INSURER	POLICY NUME
12/1/73	12/1/74	LLOYDS & BRITISH	FUL079483
12/1/73	12/1/74	LLOYDS & BRITISH	FUL079482
12/1/73	12/1/74	LLOYDS & BRITISH	FUL079484
12/1/74	12/1/75	LLOYDS & BRITISH	FUL079483
12/1/74	12/1/75	LLOYDS & BRITISH	FUL079482
12/1/74	12/1/75	LLOYDS & BRITISH	FUL079484
12/1/74	12/1/75	CONTINENTAL INS	11LX1218950
12/15/74	12/1/75	EMPLOYERS RE	PLE27464
12/15/74	12/1/75	AETNA CASUALTY	08XN78WCA
12/15/74	12/1/75	AMERICAN HOME	CE3449866
12/1/75	12/1/76	AETNA CASUALTY	08XN78WCA
12/1/75	12/1/76	EMPLOYERS RE	PLE27464
12/1/75	12/1/76	LLOYDS & BRITISH	FUL079484
12/1/75	12/1/76	CONTINENTAL INS	11LX1218950
12/1/75	12/1/76	LLOYDS & BRITISH	FUL079483
12/1/75	12/1/76	LLOYDS & BRITISH	FUL079482
12/1/75	12/1/76	AMERICAN HOME	CE3449866
12/1/76	12/1/77	LLOYDS & BRITISH	FUL080392
12/1/76	12/1/77	CENTRAL NAT. INS.	CNZ140346
12/1/76	12/1/77	LLOYDS & BRITISH	FUL080393
12/1/76	12/1/77	LLOYDS & BRITISH	FUL080391
12/1/76	12/1/77	LLOYDS & BRITISH	FUL080394
12/1/77	12/1/78	CENTRAL NAT. INS.	CNZ141702
12/1/77	12/1/78	LLOYDS & BRITISH	FUL080394
12/1/77	12/1/78	LLOYDS & BRITISH	FUL080393
12/1/77	12/1/78	LLOYDS & BRITISH	FUL080392
12/1/77	12/1/78	LLOYDS & BRITISH	FUL080809
12/1/78	12/1/79	LLOYDS & BRITISH	FUL080393
12/1/78	12/1/79	LLOYDS & BRITISH	FUL080394
12/1/78	12/1/79	LLOYDS & BRITISH	FUL080392
12/1/78	12/1/79	LLOYDS & BRITISH	FUL082325
12/1/78	12/1/79	AETNA CASUALTY	08XN144WCA
12/1/78	12/1/79	PINE TOP INS.	MLP100939
12/1/78	12/1/79	MIDLAND INSURANCE	XL160224
12/1/79	7/1/80	LLOYDS & BRITISH	FUL080392
12/1/79	7/1/80	COLUMBIA CASUALTY	RDX4169878
12/1/79	7/1/80	LLOYDS & BRITISH	FUL082948
12/1/79		LLOYDS & BRITISH	FUL080393
12/1/79		LLOYDS & BRITISH	FUL080394
12/1/79		FEDERAL INSURANCE	79356649
12/1/79		NORTHBROOK INS.	63006199
12/1/79		NTER, SURPLUS	XSI6101
12/1/79		AETNA CASUALTY	08XN162WCA
12/1/79		FIRST STATE	928134
7/1/80		NORTHBROOK INS.	63007209
7/1/80		LLOYDS & BRITISH	551UMA0391
7/1/80		LLOYDS & BRITISH	551UMA392
7/1/80	Contract to	LLOYDS & BRITISH	551UMA393
7/1/80		AETNA CASUALTY	01XN2734WCA
7/1/80		FIRST STATE	930677
7/1/80		COLUMBIA CASUALTY	RDX4170095
7/1/80		NTER. SURPLUS	XSI6274
7/1/80		AETNA CASUALTY	01GL57447SCA

POL EFFECT DATE	POL EXPIR DATE		POLICY NUMBER
7/1/80	7/1/81	AETNA CASUALTY	(CN)01LG88004175
7/1/80	7/1/81	AETNA CASUALTY	(TX)01AL314347S0
7/1/80	7/1/81	FEDERAL INSURANCE	79355022
7/1/81	7/1/82	AETNA CASUALTY	01XN3070WCA
7/1/81	7/1/82	LLOYDS & BRITISH	551UMA0391
7/1/81	7/1/82	LLOYDS & BRITISH	551UMA0392
7/1/81	7/1/82	LLOYDS & BRITISH	551UMA0307
7/1/81	7/1/82	FIRST STATE	932243
7/1/81	7/1/82	COLUMBIA CASUALTY	RDX4170235
7/1/81	7/1/82	GOVERNMENT EMPLOY	GXU30039
7/1/81	7/1/82	FEDERAL INSURANCE	79355022
7/1/81	7/1/82	MISSION INSURANCE	M877281
7/1/81	7/1/82	AETNA CASUALTY	01GL57498SCA
7/1/81	7/1/82	NORTHBROOK INS.	63008102
7/1/81	7/1/82	INTER. SURPLUS	XSI7477
7/1/82	7/1/83	GIBRALTAR CAS.	GMX01792
7/1/82	7/1/83	CIGNA-INA	ISLG0209188
7/1/82	7/1/83	LLOYDS & BRITISH	551UMA0391
7/1/82	7/1/83	LLOYDS & BRITISH	551UMA0392
7/1/82	7/1/83	TRANSIT CASUALTY	SCU956293
7/1/82	7/1/83	COLUMBIA CASUALTY	RDX9176144
7/1/82	7/1/83	INTER. SURPLUS	XSI8366
7/1/82	7/1/83	FEDERAL INSURANCE	79355022
7/1/82	7/1/83	GOVERNMENT EMPLOY	GXU30157
7/1/82	7/1/83	MISSION INSURANCE	M885832
7/1/82	7/1/83	CONTINENTAL INS	SRX1591725
7/1/82	7/1/83	INTEGRITY INS.	XL3000963
7/1/82	7/1/83	AETNA CASUALTY	01XN3432WCA
7/1/82	7/1/83	TWIN CITY FIRE	TXS101376
7/1/82	7/1/83	FIRST STATE	933271
7/1/82	7/1/83	COMMERCIAL UNION	CY9501386
7/1/83	7/1/84	FIRST STATE	934369
7/1/83	7/1/84	INTER. SURPLUS	XSI8601
7/1/83	7/1/84	LLOYDS & BRITISH	551UQA0223
7/1/83	7/1/84	GIBRALTAR CAS.	GMX02259
7/1/83	7/1/84	MIDLAND INSURANCE	XL748953
7/1/83	7/1/84	AMERICAN CENTENNI	CC015691
7/1/83	7/1/84	LLOYDS & BRITISH	551UQA0224
7/1/83	7/1/84	AETNA CASUALTY	38XN43WCA
7/1/83	7/1/84	CONTINENTAL INS	SRX1591997
7/1/83	7/1/84	TRANSIT CASUALTY	SCU956552
7/1/83	7/1/84	FIREMAN'S FUND	XLX1533898
7/1/83	7/1/84	GOVERNMENT EMPLOY	GXU30262
7/1/83	7/1/84	TWIN CITY FIRE	TXS102874
7/1/83	7/1/84	INTEGRITY INS.	XL3000656
7/1/83	7/1/84	LEXINGTON	5523503
7/1/83	7/1/84	MISSION INSURANCE	M888584
7/1/83	7/1/84	FEDERAL INSURANCE	79282213
7/1/83	0.0000000	CIGNA-INA	ISLG0209870
7/1/84		LLOYDS & BRITISH	551UQA0224
7/1/84		LLOYDS & BRITISH	551URA0138
7/1/84		AMERICAN CENTENNI	CC015888
7/1/84		LLOYDS & BRITISH	551UQA0223

POL EFFECT DATE	POL EXPIR DATE	INSURER	POLICY NUMBE
7/1/84		TRANSIT CASUALTY	SCU956853
7/1/84	7/1/85	MIDLAND INSURANCE	XL770344
7/1/84	7/1/85	GIBRALTAR CAS.	GMX02675
7/1/84	7/1/85	NORTH RIVER INS.	5220362385
7/1/84	7/1/85	CIGNA-INA	ISLG0313158-0
7/1/84	7/1/85	FEDERAL INSURANCE	79282213
7/1/84	7/1/85	HARBOR INSURANCE	HI178482
7/1/84	7/1/85	LEXINGTON	5523506
7/1/84	7/1/85	INTEGRITY INS.	XL3000656
7/1/84	7/1/85	EMPLOYER'S MUTUAL	MMO73592
7/1/84	7/1/85	CIGNA-INA	XCP156214
7/1/84	7/1/85	FIREMAN'S FUND	XLX1621158
7/1/84	7/1/85	MISSION INSURANCE	M890448
7/1/84	7/1/85	AETNA CASUALTY	38XN51WCA
7/1/85	7/1/86	AETNA CASUALTY	38XN59WCA
7/1/85	7/1/86	S-W RETENTION	EXF-374757
7/1/85	7/1/86	S-W RETENTION	EXF-374757
7/1/85	. 7/1/86	LLOYDS & BRITISH	551UQA0224
7/1/85		CIGNA-INA	XCPG0313469-6
7/1/85	7/1/86	LLOYDS & BRITISH	USA 0427
7/1/85	7 (10) (10)	HOME INSURANCE	HXL-1639361
7/1/85	01/2/200	LLOYDS & BRITISH	551UQA0223
7/1/85	77.00	AETNA CASUALTY	38XN60WCA
7/1/85		MISSION INSURANCE	MN033136
7/1/85		CIGNA-INA	XCPG0313469-6
7/1/85		S-W RETENTION	NA
CONTRACT!		CIGNA-INA	ISLG0776537A
7/1/85			
7/1/85	A CONTRACTO	AETNA CASUALTY	38XN58WCA
7/1/86	The state of the s	LLOYDS & BRITISH	UTA0196
7/1/86		CIGNA-INA	ISLG0912087-7
7/1/86		S-W RETENTION	N/A
7/1/86	24,333,33	LLOYDS & BRITISH	UTA0195
7/1/86		CONSTITUTION STAT	FE111527
7/1/86		IL EXCHANGE	DOL-06013-E
7/1/86		CONSTITUTION STAT	FE121601
7/1/86	7/1/87	IL EXCHANGE	DOL-06012-E
7/1/86	7/1/87	LLOYDS & BRITISH	UTA0197
7/1/86	5/1/90	X.L.	TBD (1990)
7/1/86	7/1/87	X.L.	G159HXA
7/1/86	5/1/90	X.L.	TBD (1990)
7/1/86	5/1/89	NATIONAL UNION	4267517 (1989)
7/1/86	7/1/87	S-W RETENTION	N/A
7/1/86	7/1/87	CIGNA-INA	XLPG0912636-3
7/1/87	7/1/88	X.L.	G159HXA
7/1/87	7/1/88	CIGNA-INA	XLPG1041521-4
7/1/87	7/1/88	LLOYDS & BRITISH	UVA0248
7/1/87	7/1/88	LLOYDS & BRITISH	551UTA0195
7/1/87	7/1/88	CIGNA-INA	ISLG0358592-A
7/1/88		CIGNA-INA	ISLG1179109-8
7/1/88		LLOYDS & BRITISH	UTA0195
7/1/88		LLOYDS & BRITISH	UAA0239
7/1/88		LEXINGTON	UAA0240
7/1/88	5/1/89		G159HXA

POL EFFECT DATE	POL EXPIR DATE	INSURER	POLICY NUMBER
5/1/89	5/1/90	S-W RETENTION	N/A
5/1/89	5/1/90	CIGNA-INA	OGLG1278767-4
5/1/89	5/1/90	NATIONAL UNION	BE2058162
5/1/89	5/1/90	X.L.	G159HXA
5/1/90	5/1/91	FIRST STATE	FL0001902
5/1/90	5/1/91	X.L.	
5/1/90	5/1/91	X.L.	
5/1/90	5/1/91	X.L.	XLUMB-00399
5/1/90	5/1/91	PLANET (RELIANCE)	NUA149695900
5/1/90	5/1/91	S-W RETENTION	NA
5/1/90	5/1/91	NATIONAL UNION	BE3078818
5/1/90	5/1/91	CIGNA-INA	OGLG1157144-A
5/1/90	5/1/91	CAL UNION	ZCX010009
5/1/91	5/1/92	STEADFAST(ZURICH)	CE6611938-00
5/1/91	5/1/92	INS CO OF PA	46912660
5/1/91	5/1/92	CAL UNION	ZCX011255
5/1/91	5/1/92	X.L.	XLUMB-00399
5/1/91	5/1/92	FIRST STATE	FL0002545
5/1/91	5/1/92	NATIONAL UNION	BE3082932
5/1/91	5/1/92	S-W RETENTION	NA
5/1/91	5/1/92	CIGNA-INA	HDCG1157364-2
5/1/91	5/1/92	CIGNA-INA	XCPG11573770
5/1/91	5/1/92	FEDERAL INSURANCE	7909-04-97
5/1/91	5/1/92	X.L.	
5/1/91		PLANET (RELIANCE)	NUA149695901
5/1/92		Cal Union	ZCX 02 00 51
5/1/92	5/1/93		XLUMB-00399
5/1/92		American Excess Ins Assoc	HN000055892
5/1/92		Federal Insurance	(93) 7909-04-97
5/1/92		Agricultural (Great American)	EXC 7-30-61-03-0
5/1/92		Ins Co of Pa	4692-3035
5/1/92	The All All All All All All All All All Al	International (Crum & Forster)	531-205506-9
5/1/92		First State	FL 0003197
5/1/92		National Union	BE 308 61 63
5/1/92		Cigna-INA	HDC G1 402709-9
5/1/92		Planet (Reliance)	NEA 1496959
5/1/93	7,000	Nutmeg (Hartford)	YA0000049
			- United State Control of the Contro
5/1/93	5/1/94		XLUMB-00399
5/1/93		Cigna-INA	HDC G1 402709-9
5/1/93		National Union	BE 309 12 03
5/1/93		Agricultural (Great American)	EXC 730-61-03
5/1/93	the same to the sa	International (Crum & Forster)	531-206480-7
5/1/93	5/1/94		HA 006489
5/1/93		Planet (Reliance)	NEA 1496959
5/1/93		Federal Insurance	(94) 7909-04-97
5/1/93		Ins Co of Pa	4693-3607
5/1/93		American Excess Ins Assoc	HR000067693
5/1/93		National Surety (Fireman's Fund)	XXK-000-3180-71
5/1/94		Cigna-INA	HDC G1 658663-8
5/1/94		National Union	BE 309 12 03
5/1/94	5/1/95	MANUAL CONTROL OF THE PARTY OF	XLUMB-00399
5/1/94	5/1/95	American Excess Ins Assoc	HR000079294
5/1/94	5/1/95	National Surety (Fireman's Fund)	XXK-0008212-934

POL EFFECT DATE	POL EXPIR DATE	INSURER	POLICY NUMBER
5/1/94	5/1/95	Federal Insurance	(95) 7909-04-97
5/1/94	5/1/95	Royal	HA 007760
5/1/94	5/1/95	Ins Co of Pa	4694-3676
5/1/94	5/1/95	Reliance National Indemnity	NEA 1496959
5/1/94	5/1/95	Gulf Insurance Co	GA 5654051
5/1/94	5/1/95	Agricultural (Great American)	EXC 763-64-60